

1 Michelle Bertsch
2 4030 Deerfield Avenue
3 Las Vegas, Nevada 89147
4 702-371-8288
5 In Proper Person

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
APR - 2 2018	
CLERK US DISTRICT COURT	
DISTRICT OF NEVADA	
DEPUTY	

6
7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 MICHELLE BERTSCH,

10 Plaintiffs,

11 vs.

12 DISCOVER FINANCIAL SERVICES, CHASE BANK,
13 SEARS CITIBANK DBA CBNA, US BANCORP,
14 BANK OF AMERICA, N.A., SYNCHRONY
15 FINANCIAL, AND ROES I THROUGH X,
16 INCLUSIVE,

17 Defendants.

Case No.: 2:18-CV-00290-GMN-GWF

18 **PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S**
MOTION TO DISMISS

19 COMES NOW, Plaintiff, Michelle Bertsch, in proper person, and hereby moves the
20 Court, pursuant to Rule 6 of the Federal Rules of Civil Procedure, for an extension of time for
21 Plaintiff to oppose the Motion to Dismiss for Bank of America, Chase, and US Bank. In support
22 of this motion, Plaintiff states as follows:

- 23 1. Plaintiff filed the Complaint on February 15, 2018. Defendants, Bank of America,
24 Chase, US Bank have filed a motion to dismiss, which was due on March 30, 2018, the
25 time to respond expired during the weekend period.
26 2. Plaintiff is currently putting together the opposition and needs additional time to conduct
27 the investigation and respond appropriately.

1 3. Plaintiff attempted to contact Defendant to request her consent to this extension. To date,
2 no return call has been made. Therefore, Plaintiff requests a thirty (30) day extension to
3 respond to the Motions to Dismiss, through April 30, 2018.

4 4. This motion is not made for the purpose of delay, and it will not prejudice the parties.

5 The relief requested will not affect any other litigations deadlines in this case.

6

7 MEMORANDUM

8 Rules 6(b) of the Federal Rules of Civil Procedure provides that the Court may grant the
9 extensions of time at any time in its discretion for good cause shown. Where, as her, the request
10 for extension is made on the day of expiration, next business day, no finding of excusable neglect
11 is required. Plaintiff respectfully submits this good cause has been shown above for an extension
12 of time.

13

14 WHEREFORE, for the foregoing reasons and authorities, Plaintiff respectfully requests
15 that the Court grant this motion and extend Plaintiff's deadline to respond to Defendant's Motion
16 to Dismiss in this case until April 30, 2018. A proposed order is attached hereto as Exhibit A.

17

18 Dated this 2nd day of April 2018.



19

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CERTIFICATE OF MAILING

I HEREBY CERTIFY that service of the Motion for Extension of Time to Respond to
Opposition to Motion to Dismiss was made this 2 day of April 2018, by depositing a copy of
the same in the U.S. Mail, postage prepaid, regular mail, addressed to:

Darren T. Brenner, Esq.
1635 Village Center Circle, Ste. 200
Las Vegas, Nevada 89134

Lindsay C. Demaree, Esq.
1980 Festival Plaza Drive, Ste. 900
Las Vegas, Nevada 89135

Rex Garner, Esq.
1635 Village Center Circle, Ste. 200
Las Vegas, Nevada 89134

Tyson E. Hafen, Esq.
100 North City Parkway, Ste. 1560
Las Vegas, Nevada 89160

Joel Edward Tasca, Esq.
1980 Festival Plaza Drive, Ste. 900
Las Vegas, Nevada 89135

DATED this 2 day of April, 2018.

Respectfully submitted,

By:

Maggie Strickland

1 Michelle Bertsch
2 4030 Deerfield Avenue
3 Las Vegas, Nevada 89147
4 702-371-8288
5 In Proper Person

6
UNITED STATES DISTRICT COURT

7
DISTRICT OF NEVADA

8 MICHELLE BERTSCH,

9 Plaintiffs,
vs.

10 DISCOVER FINANCIAL SERVICES, CHASE BANK,
11 SEARS CITIBANK DBA CBNA, US BANCORP,
12 BANK OF AMERICA, N.A., SYNCHRONY
FINANCIAL, AND ROES I THROUGH X,
INCLUSIVE,

13 Defendants.

Case No.: 2:18-CV-00290-GMN-GWF

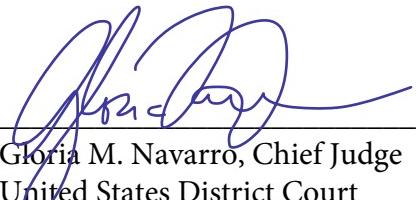
14
ORDER GRANTING PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND
15 **TO MOTION TO DISMISS**

16 THIS MATTER coming before the above-signed United States District Court for the
17 District of Nevada upon Plaintiff's Motion for Extension of Time to Respond to Motion to
18 Dismiss (herein, the "Motion") and the Court finding good cause that such Motion should be
19 granted.

20
IT IS HEREBY ORDERED that the response date for Plaintiff to respond to the Motion
21 to Dismiss by Bank of America, US Bank, and Chase is hereby extended to an including April 30,
22 2018.

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DATED this 17 day of April, 2018.

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26
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Gloria M. Navarro, Chief Judge
United States District Court